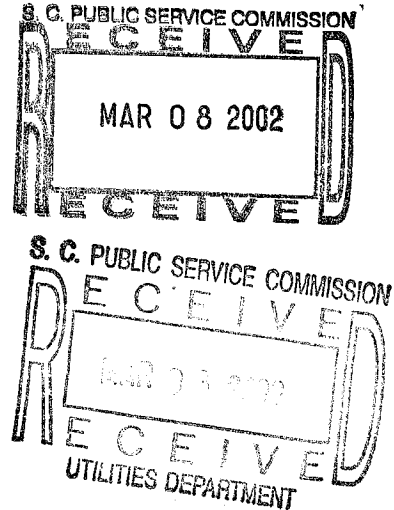


BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2001-507E

In Re:

APPLICATION FOR A CERTIFICATE)
OF ENVIRONMENTAL COMPATIBILITY)
AND PUBLIC CONVENIENCE AND NECESSITY)
PALMETTO ENERGY CENTER, LLC.)
_____)



Q. PLEASE STATE YOUR NAME AND ADDRESS.

A. My name is Susan M. Adams. My address is 214 Pebble Creek Crossing, Fort Mill, South Carolina.

Q. IN WHAT CAPACITY ARE YOU APPEARING TODAY?

A. I am a resident within three miles of the site of the proposed Palmetto Energy Center.

Q. ON WHOSE BEHALF ARE YOU APPEARING IN THIS PROCEEDING?

A. I am appearing on behalf of myself and other individuals who have filed petitions to intervene in the Application of the Palmetto Energy Center, LLC.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE REGULATORY AGENCIES?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony describes flaws in the application of Palmetto Energy Center of such a nature that the Honorable Commission should deny the application.

RETURN DATE: 04/11/02
SERVICE: OK per D. Butler

POSTED
3-8-02
ARW CH
New Res

Q. ARE YOU FAMILIAR WITH THE FACTS AND INFORMATION SET FORTH PALMETTO ENERGY CENTER'S APPLICATION?

A. Yes, I have reviewed the application and other documents provided by the applicant to those who have filed a petition to intervene.

Q. WHAT ARE YOUR CONCLUSIONS WITH REGARD TO THE PROPOSED PALMETTO ENERGY CENTER?

A. I) Need for this facility in this area is not valid. Pace market assessment study makes no assurances of validity, accuracy or completeness and thus is of no value in determining need for this plant in this area at this time. Duke Power is obligated to meet the power needs for the area in which the proposed facility is to be sited. If Duke Power is unable to expand in this area due to this plant's taxing of our resources, they will be forced to purchase power from this or other merchant facilities for higher cost than that of the power they generate themselves. The end result of this will be increased cost to South Carolina consumers.

ii) The siting of this plant will increase consumer natural gas prices by creating an artificial demand upon supply in the area.

iii) Upgrading the natural gas pipeline to supply gas to the proposed plant is addressed in the application but no mention is made of who will bear the responsibility for the cost of the pipeline. There is currently a \$17 million dollar shortfall in the \$20 million dollar cost of the pipeline and the \$3 million dollars the state infrastructure fund is allotting. If the \$17 million is passed on to consumers the end result will be increased natural gas prices to local consumers.

iv) Applicant has no contracts to sell power in this or any other region.

v) The application lists no population figures in radius to plant site. One site rejected as too near neighborhoods is a rural area, the site chosen is largely suburban.

vi) The site chosen is on a dead end street and as a result has limited ingress and egress. This would present a dangerous situation in the event of an emergency.

vii) Applicant repeatedly refers to plant as “state of the art” when in reality there are cleaner and more current combustion technologies available which will not be used here.

Applicant's plants in California emit 2.0-2.5 parts per million nitrogen oxide. This plant will emit 3.5 PPM nitrogen oxide. There is also a technology available to reduce carbon referred to as “ catalytic oxidation”. This was required at a plant of this type in Arizona. Applicant has refused to use available, cleaner technology on the proposed plant in York County.

In Re: Docket No. 2001-507-E

I, Susan M. Adams, do certify that I have served one copy of the foregoing testimony to each of the parties of record by causing said copy to be deposited with the United States Postal Service, first class postage prepaid.



Susan M. Adams
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